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12  
13 **IN THE UNITED STATES DISTRICT COURT**  
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15 **FOR THE DISTRICT OF UTAH**

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16 ERIC SCHIERMEYER, Derivatively on Behalf  
17 of Nominal Defendant, BLOCKCHAIN GAME  
18 PARTNERS, INC. D/B/A GALA GAMES,

19 Plaintiff,

20 vs.

21 WRIGHT THURSTON and TRUE NORTH  
22 UNITED INVESTMENTS, LLC,

23 Defendants,

24 and

25 BLOCKCHAIN GAME PARTNERS, INC.  
26 D/B/A GALA GAMES,

27 Nominal Defendant.

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**DECLARATION OF TRAVIS  
ALLEN IN SUPPORT OF  
PLAINTIFF ERIC  
SCHIERMEYER'S MOTION  
TO FREEZE ASSETS, FOR AN  
ACCOUNTING, AND FOR  
EXPEDITED DISCOVERY**

**Case No: 2:23-cv-00589-HCN**

**Hon. Howard C. Nielson, Jr.**

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**DECLARATION OF JASON BRINK IN SUPPORT OF PLAINTIFF'S MOTIONS**

**DECLARATION OF TRAVIS ALLEN**

1  
2 1. I, Travis Allen, am a Blockchain Engineer for Blockchain Game  
3 Partners, Inc., (“BGP”) d/b/a Gala Games. In my role as Blockchain Engineer, I am  
4 familiar with both the day-to-day operations and the overall operations of Gala  
5 Games. As such, I have knowledge of the facts set forth herein and could and would  
6 testify competently thereto if called upon to do so. I also am familiar with the records  
7 of Gala Games, which I consulted in order to determine the numbers set forth herein,  
8 all of which are business records maintained in Gala Games’ files and systems in the  
9 ordinary course of business.

10 2. Prior to working for Gala Games, Wright Thurston hired me to work as a  
11 software engineer for a number of other blockchain-related companies that he had  
12 founded. These companies, including “Green Blockchain,” “Blue Blockchain” and  
13 others, were promoted via his “Connect Blockchain” multi-level marketing sales  
14 network.

15 3. While working on these projects, I had a hard time understanding the  
16 actual products or benefits being offered, how the blockchains worked, and what they  
17 did. The companies’ efforts were loaded on the sales front, without much thought to  
18 the actual engineering behind what was offered. This was concerning to me.

19 4. I was also part of the original discussions regarding the distribution  
20 model to be used at Gala Games dating back to 2019, and I helped engineer the  
21 distribution model. I recall that others in those discussions were Eric Schiermeyer,  
22 Jayden Johnston, and Mason Galland. I do not recall whether or not Wright Thurston  
23 was involved. The Gala Games distribution model involved a portion of the daily  
24 token distribution going directly to Gala Games.

25 5. My understanding of the portion of the GALA distribution that went to  
26 the Gala Games wallet (the “Central Wallet”) has always been that the GALA  
27 belonged to Gala Games to be used by the company.  
28

1           6.       Over time, the balance of GALA held in Gala Games's Central Wallet  
2 approached 20 billion.

3           7.       To limit risk from hackers and cybersecurity threats, Gala Games  
4 transferred about 19.9 billion tokens from this central wallet to dozens of other  
5 company-owned wallets ("Company Savings Wallets"). I personally generated the  
6 script to create the Company Savings Wallets and the script that distributed the GALA  
7 from the Central Wallet to the Company Savings Wallets.

8           8.       I provided the private keys for the Company Savings Wallets to Eric  
9 Schiermeyer and Wright Thurston, the two directors of Gala Games.

10          9.       At some point after February 3, 2021, I received a call from Jason Brink  
11 asking me to look at the balances in the Company Savings Wallets. I reviewed those  
12 wallets and found that billions of GALA had been transferred out of them. Initially, I  
13 thought that the wallets had been hacked, but this would have been very difficult  
14 unless someone had access to either Eric Schiermeyer's or Wright Thurston's laptop.

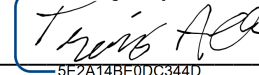
15          10.       I then got on a call with Eric Schiermeyer, Jason Brink and Adam Price  
16 to discuss the stolen GALA. I recall that, during that call, Eric contacted Wright and  
17 asked about the missing tokens. As I recall, Wright then joined our call and said that  
18 he had moved the GALA to other wallets for safe keeping, although I do not  
19 remember who all was on the call at that time.

20          11.       I then created a script to monitor the Thurston Wallets to determine if and  
21 when any GALA was moved in or out of those wallets.

22               I declare, under penalty of perjury of the laws of Utah and of the United States  
23 of America, that the foregoing is true and accurate.

24  
25 Dated: August 30, 2023

DocuSigned by:

  
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Travis Allen  
Blockchain Engineer  
Blockchain Game Partners, Inc.